

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

1)	DENNIS TAYLOR,	)	
2)	SEAN McDONALD and	)	Case No. 4:14-cv-00293-JED-TLW
3)	TIKA McDONALD INDIVIDUALLY	)	
	AND ON BEHALF OF ALL OTHERS	)	
	SIMILARLY SITUATED,	)	
		)	
	PLAINTIFFS,	)	
		)	
v.		)	
		)	
4)	MICHELIN NORTH AMERICA,	)	
	INC.,	)	
		)	
	DEFENDANT.	)	
		)	

**MOTION FOR ADMISSION *PRO HAC VICE* OF CHRISTOPHER J. SCHMIDT**

I, Connie M. Bryan, a member in good standing of the bar of the State of Oklahoma and co-counsel for Michelin North America, Inc. Defendant, hereby moves this Court, pursuant to the Local Civil Rules of the United States District Court for the North District of Oklahoma LCvR83.2(g), for the admission *pro hac vice* of Attorney Christopher J. Schmidt, Bryan Cave, LLP, 211 N. Broadway, Suite 3600, St. Louis, MO 63102, to appear and defend Michelin North America, Inc. in the above-captioned matter. The following facts support this Motion:

1. Attorney Christopher J. Schmidt, has associated with Connie M. Bryan, McCormick & Bryan, PLLC, 3500 S. Boulevard, Suite 10B, Edmond, OK 73013. Connie M. Bryan is co-counsel for Defendant Michelin North America, Inc. and has entered an appearance in this matter.

2. The highest state courts in which Attorney Schmidt has been admitted are the Supreme Court for the State of Missouri (2002) and the Supreme Judicial Court for the State of Illinois (2008). Attorney Schmidt has also been admitted to five United States District Courts and the Court of Appeals for the Seventh Circuit. (See Request for Admission Pro Hac Vice, attached at

Exhibit “A”).

3. I hereby certify that Attorney Schmidt is a member in good standing with all of the courts listed on Exhibit A.

4. Attorney Schmidt has represented Michelin North America since its receipt of Plaintiffs’ initial Petition and is familiar with the subject matter of this action and the proceedings herein to date. Accordingly, Defendant, Michelin North America, has requested that he represent it as co-counsel with Connie M. Bryan in this action.

5. Attorney Schmidt has never been disbarred or suspended from practice before any court, department bureau or commission of any State or the United States, nor has Attorney Schmidt ever received any reprimand from any such court, department, bureau or commission pertaining to conduct or fitness as a member of the Bar.

6. Attorney Schmidt is familiar with the Federal Rules of Civil Procedure, the Federal Rules of Evidence and the Local Rules of the Northern District of Oklahoma.

7. The *pro hac vice* admission fee is being paid instantaneously with the filing of this Motion.

Wherefore, Connie M. Bryan, respectfully requests this Court to enter an order permitting the admission of Attorney Christopher J. Schmidt, to the Northern District of Oklahoma *pro hac vice* for this case only.

Respectfully submitted,

By: /s/Connie M. Bryan

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Attorneys for Defendant Michelin North America, Inc.

The undersigned attorney has sent a copy of this Motion for Admission Pro Hac Vice on the 11<sup>th</sup> day of June, 2014, via U.S. Postal Service, postage pre-paid to the Plaintiffs to the following:

Benjamin L. Barnes  
Centennial Plaza  
2575 Kelley Pointe Parkway, Suite 100  
Edmond, OK 73013

and

R. Chris Cowan  
The Cowan Law Firm  
209 Henry Street  
Dallas, Texas 75226-1819

By: /s/ Connie M. Bryan  
Connie M. Bryan, OBA #13664  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

DENNIS TAYLOR, et al.

Plaintiff(s)

vs.

Case Number: 4:14-cv-00293-JED-TLW

MICHELIN NORTH AMERICA, INC.,  
Defendant(s)

**REQUEST FOR ADMISSION PRO HAC VICE**  
(to be attached to Motion for Admission Pro Hac Vice)

I hereby request admission to the Bar of this Court PRO HAC VICE in support of which I represent that the answers to the following questions are complete, true, and correct:

1. Full Name: Christopher John Schmidt
2. State bar membership number: 53362 (Missouri)
3. Business address, telephone and fax numbers: Bryan Cave LLP, 211 N. Broadway, Suite 3600, St. Louis, MO 63102  
Direct: (314) 259-2616; Fax: (314) 552-8616
4. List all state and federal courts or bar associations in which you are a member "in good standing" to practice law:  
Missouri; Illinois; USDC SDIL; USDC CDIL; USDC WDMO; USDC EDMO; USDC EDAR; 7th Circuit Crt of Appeals
5. Have you been denied admission, disbarred, suspended from practice, reprimanded, denied "in good standing" status, or otherwise disciplined by any court, bar association, grievance committee or administrative body? ☐ Yes ☒ No
6. Have any proceedings which could lead to any such disciplinary action been instituted against you in any such bodies? ☐ Yes ☒ No  
(Please attach a statement explaining any "Yes" answers to questions 5 or 6.)
7. Are you familiar with the Federal Rules of Evidence, the Federal Rules of Civil or Criminal Procedure (as applicable to this case) and the local rules of this court? ☒ Yes ☐ No

Signature

Christopher J. Schmidt  
Printed Name

53362 (Missouri)  
Bar Number

BRYAN CAVE LLP  
Firm Name

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Email Address

**CERTIFICATE OF SERVICE**

I hereby certify that on June , 2014, (Date), I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants (names only are sufficient):

Benjamin L. Barnes, Centennial Plaza, 2575 Kelley Pointe Parkway, Suite 100, Edmond, OK 73013

R. Chris Cowan, The Cowan Law Firm, 209 Henry Street, Dallas, TX 75226-1819

I hereby certify that on (Date), I served the same document by

☐ U.S. Postal Service

☐ In Person Delivery

☐ Courier Service

☐ E-Mail

on the following, who are not registered participants of the ECF system:

Name(s) and Address(es):

  
Signature

BAR ADMISSIONS

Christopher J. Schmidt

Supreme Court of Missouri	9/18/2002	Missouri Bar # 53362
Supreme Court of Illinois	10/15/2008	Illinois Registration # 6295695
US District Court, EDMO	11/22/2002	
US District Court, WDMO	5/13/2005	
US District Court, SDIL	11/7/2003	
US District Court, CDIL	2006	
US District Court, ED Arkansas	9/28/2006	
7 <sup>th</sup> Circuit Court of Appeals	5/16/2008	